



March 27, 2025

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works,
Docket No. R-2025-3053112**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the **Petition to Intervene of the Tenant Union Representative Network (“TURN”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”)** in the above captioned matter.

A copy of this Petition is being served via email, as indicated on the attached Certificate of Service.

Sincerely,

Benjamin Clark, Esq.
Counsel for TURN and CAUSE-PA
Community Legal Services, Inc.

Encl.

Cc: Certificate of Service



BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket No. R-2025-3053112
Philadelphia Gas Works :

CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, served copies of the **Petition to Intervene of the Tenant Union Representative Network and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

SERVICE BY EMAIL ONLY

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March 27, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
v.	:	Docket No. R-2025-3053112
Philadelphia Gas Works	:	

**PETITION TO INTERVENE OF THE TENANT UNION REPRESENTATIVE
NETWORK AND THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA**

The Tenant Union Representative Network (“TURN”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through counsel Community Legal Services, Inc., hereby file this Petition to Intervene in the above-captioned proceeding, pursuant to the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (“PUC” or “Commission”), 52 Pa. Code §§ 5.71-5.76, and in support thereof, state as follows:

1. On February 27, 2025, Philadelphia Gas Works (“PGW” or “Company”) filed with the PUC its proposed Supplement No. 176 to PGW’s Gas Service Tariff – Pa P.U.C. No. 2 (“Supplement No. 176”) and proposed Supplement No. 119 to PGW’s Supplier Tariff – Pa P.U.C. No. 1 (“Supplement No. 119”), collectively the “2025 Base Rate Case Filing,” which was assigned this Docket No. R-2025-3053112.

2. In its filing, PGW seeks to increase the distribution base rates charged to PGW’s residential, commercial and industrial customers. PGW proposes to increase its distribution rates by approximately \$105.0 million per year, or 15.73%, effective April 28, 2025.

3. If PGW's rate request is approved, the average monthly bill of a residential customer using 61 thousand cubic feet (Mcf) per year will increase by \$12.01 from \$92.60 to \$104.61, or by 13.0%.
4. As part of its request, PGW proposes to increase its fixed customer charge for residential customers from \$16.25 per month to \$19.50 per month.
5. The Commission's Regulations provide that "a petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought." 52 Pa. Code § 5.72(a).
6. The Commission's Regulations permit intervention by persons claiming "an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(2).
7. In Pennsylvania, an association may have standing as a representative of its members, provided the organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action. See PPL Electric Utilities Corporation's Universal Service and Energy Conservation Plan for 2011-2013, Docket No. M-2010-2179796 (internal citations omitted).
8. The Commission has previously determined that a not-for-profit organization may have standing in a representational capacity, including both associations and not-for-profit corporations. PPL Electric Utilities Corporation's Universal Service and Energy Conservation Plan for 2011-2013, Docket No. M-2010-2179796, Opinion and Order dated May 5, 2011 at 11.

9. Petitions to intervene shall be filed no later than the date fixed for filing protests as published in the Pennsylvania Bulletin except for good cause shown. 52 Pa. Code § 5.74(b)(2). TURN and CAUSE-PA timely submit this petition.
10. Petitioner TURN is a not-for-profit advocacy organization composed of moderate- and low-income tenants, most of whom are either customers of or dependent on gas service from PGW. As a result, TURN has a direct, immediate, substantial, and distinct interest in the impact of the proposed PGW rate increase.
11. TURN is located at 100 South Broad Street, Suite 800, Philadelphia, PA 19110.
12. Petitioner CAUSE-PA is an unincorporated association of low-income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating, and telecommunication services. Many CAUSE-PA members depend on gas from PGW and therefore have a direct, immediate, substantial, and distinct interest in the impact of the proposed PGW rate increase.
13. CAUSE-PA is located c/o the Pennsylvania Legal Aid Network, at 118 Locust Street, Harrisburg, PA 17101.
14. Petitioners were parties in prior Commission proceedings involving PGW, including, but not limited to, the following:
 - a. PGW's 2023 Base Rate Case at Docket No. R-2023-3037933;
 - b. PGW's 2020 Base Rate Case at Docket No. R-2020-30172061;
 - c. PGW's Weather Normalization Adjustment (WNA) proceedings at Dockets No. R-2022-3034229 and P-2022-3034264;

- d. PGW's Universal Service and Energy Conservation Plan proceedings at Docket No. M-2021-3029323;
- e. PGW's Petition for Approval of Demand-Side Management Plan for FY 2016-2020 and Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-2016 52 Pa Code § 62.4 – Request for Waivers, Docket No. P-2014-2459362; and
- f. PGW's Universal Service and Energy Conservation Plan for 2014-2016 Submitted in Compliance with 52 Pa. Code § 62.4, Docket No. M-2013-2366301.

Petitioners have a continuing interest in the impact of PGW's gas base rate filing on moderate- and low-income residential customers.

15. PGW's general base rate filing is of critical importance to the economically vulnerable and low-income PGW residential customers who are members of TURN and CAUSE-PA. Petitioners stand to benefit from affordable natural gas service and, due to their limited income, may be harmed disproportionately by the imposition of unjust or unreasonable rates. As a result, Petitioners have interests in this proceeding which may be directly impacted by the action of the Commission. Petitioners may be bound by the action of the Commission. And finally, Petitioners' interests are not adequately represented by other parties.
16. Petitioners have preliminarily reviewed PGW's rate filing, and have tentatively identified the following issues:
- a. Whether a rate increase will result in unjust and unreasonable costs for Philadelphia's low-income residential homeowners and tenants, directly through

rates and charges or indirectly through rent obligations, based on all relevant factors;

- b. Whether PGW's proposal to increase its residential customer charge to \$19.50 is just and reasonable;
- c. Whether PGW's proposal to increase the residential volumetric charge is just and reasonable;
- d. Whether PGW's proposal to increase the average residential heating customer bill by 13.0% is just and reasonable;
- e. Whether PGW's proposal to introduce a Revenue Normalization Adjustment Mechanism is just and reasonable;
- f. Whether PECO's proposed Weather Normalization Program is just, reasonable and appropriate;
- g. Whether a rate increase is justified given the quality of PGW's customer service;
- h. Whether PGW's universal service program rules, policies and practices have been successful in mitigating the impact of PGW's high rates on low-income customers; and
- i. Whether PGW's customer application policies, termination practices, payment agreement requirements, collections policies, or other policies and practices have impeded access to service and/or contributed to reduced revenue or lost opportunities for revenue growth.

Petitioners reserve the right to examine any other issues that arise in the course of this proceeding.

17. Petitioners are represented by:

Joline R. Price, Esquire
Daniela E. Rakhlina-Powsner, Esquire
Benjamin Clark, Esquire
Robert W. Ballenger, Esquire

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18. Counsel for Petitioners consent to the service of documents by electronic mail to the email addresses of counsel listed above, as provided in 52 Pa. Code § 1.54(b)(3).

WHEREFORE, TURN and CAUSE-PA respectfully request that the Public Utility Commission enter an order granting TURN and CAUSE-PA full status as interveners in this proceeding with active party status and grant such other relief as is just and appropriate.

Respectfully submitted,



Joline R. Price, Esq. (Attorney ID: 315405)
Daniela E. Rakhlina-Powsner, Esq. (Attorney ID: 332206)
Benjamin Clark, Esq. (Attorney ID: 335697)
Robert W. Ballenger, Esq. (Attorney ID: 93434)

Counsel for TURN and CAUSE-PA
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March 27, 2025

VERIFICATION

I, Benjamin Clark, on behalf of Tenant Union Representative Network (TURN) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: March 27, 2025

A handwritten signature in black ink, appearing to read 'Be Clark', with a long horizontal flourish extending to the right.

Benjamin Clark, Esq.
Counsel for TURN and CAUSE-PA